

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Jeffrey A. Brennan	:	Chapter 13
Margaret J. Brennan	:	Case No.: 21-10278-ELF
Debtor(s)	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtors, by and through the undersigned counsel, hereby move this Honorable Court to Modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Petition on February 4, 2021.
2. The Chapter 13 Plan was confirmed on June 29, 2021.
3. On January 18, 2022, the debtor's mortgagee, Bank of America, N.A., entered a Stipulation of Settlement permitting Debtor to include post-petition arrears from missed mortgage payments in the amount of \$10,062.64 in a Modified Chapter 13 Plan. See Exhibit "A."
4. Debtors have paid \$7,560.00 to the Chapter 13 Trustee to date.
5. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$1,147.00 per month for the remaining 49 months for a new base amount of \$63,753.65. The Modified Plan is attached as Exhibit "B."
6. The debtors are aware they must remain current on all ongoing post-petition payments owed to Bank of America, N.A. in order to avoid any future modifications to the Automatic Stay.

WHEREFORE, Debtors, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan in consideration of the Stipulation of Settlement of Bank of America, N.A.

Dated: January 19, 2022

/s/Brad J. Sadek, Esq
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